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March 22, 2001

VIA OVERNIGHT DELIVERY

Docket Control Center
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Arizona Corporation Commission

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Re: CenturyTel Solutions, LLC
Docket No. T-03902A-00-0509
Comments to Staff Report

Dear Sir or Madam:

On behalf of CenturyTel Solutions, LLC, transmitted herewith are an original and ten (10) copies of the above-referenced filing. Please date stamp the enclosed extra copy and return it in the self-addressed, postage-paid envelope provided.

If you have any questions concerning this filing, please do not hesitate to contact Phyllis A. Whitten at (202) 424-7618 or Vickie S. Byrd at (202) 295-8420.

Respectfully submitted,

Phyllis A. Whitten

Phyllis A. Whitten

Vickie S. Byrd

Counsel for CenturyTel Solutions, LLC

Enclosures

cc: Stacey Goff (CTI)
John Jones (CTI)
Ron Johnson (CTS)

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BEFORE THE ARIZONA CORPORATION COMMISSION

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WILLIAM A. MUNDELL

Chairman

JIM IRVIN

Commissioner

MARC SPITZER

Commissioner

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AZ CORP COMMISSION
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IN THE MATTER OF THE APPLICATION OF)

CENTURYTEL SOLUTIONS, LLC)

FOR A CERTIFICATE OF CONVENIENCE AND)

NECESSITY TO PROVIDE COMPETITIVE)

FACILITIES-BASED AND RESOLD)

LOCAL EXCHANGE AND EXCHANGE ACCESS)

TELECOMMUNICATIONS SERVICES IN ARIZONA)

Docket No. T-03902A-00-0509

CENTURYTEL SOLUTIONS, LLC COMMENTS

I. INTRODUCTION

CenturyTel Solutions, LLC ("CTS") by undersigned counsel and pursuant to the Arizona Corporation Commission's ("Commission") Procedural Order dated January 29, 2001, hereby submits its Comments in support of its application for a Certificate of Convenience and Necessity. CTS provides these Comments to clarify information in and respond to requests made in the Staff Report forwarded to CTS on January 25, 2001 in the above-referenced docket ("Staff Report"). The Staff Report recommends approval of CTS' application following a hearing. CTS offers the following additional information as requested in the Staff Report, as well as clarifications to some of the assertions made in the Staff Report.

II. BACKGROUND

On July 14, 2000, CTS filed an application and petition for a Certificate of Convenience and Necessity to provide competitive facilities-based and resold local exchange and exchange

access telecommunications services throughout the State of Arizona ("Application"). CTS also petitioned the Commission for a determination that the services it seeks to offer should be classified as competitive.

III. RESPONSES TO REQUESTS IN THE STAFF REPORT

In response to the Staff Report, CTS states that it intends to comply with all applicable Commission rules, federal laws and federal rules. Specifically, CTS will abide by the following requirements, as recommended in the Staff Report:

1. Pursuant to Sections 2.6 and 5.1 of Staff's Report, CTS will file, within 18 months of the date it first provides service following certification, information to enable Staff to prepare an analysis and recommendation for a fair value finding on CTS' proposed rates, as well as for an analysis and recommendation for permanent tariff approval.
2. Pursuant to Sections 3.1 and 5.1(1) of Staff's Report, CTS will procure an Interconnection Agreement before it begins offering local exchange service.
3. Pursuant to Sections 3.2 and 5.1(3), CTS will file with the Commission its plan to have its customers' telephone numbers included in the incumbents' Directories and Directory Assistance databases before it begins providing local exchange service.
4. Pursuant to Sections 3.3 and 5.1(4), CTS intends to pursue permanent number portability arrangements with other local exchange carriers that are consistent with Commission rules, federal laws and federal rules.
5. Pursuant to Sections 3.4 and 5.1(5), CTS agrees to abide by and participate in the Arizona Universal Service Fund mechanism established by Decision No. 59623, dated April 24, 1996 (Docket No. RT-00000E-95-0498).
6. Pursuant to Sections 3.5 and 5.1(6), CTS will abide by the quality of service standards that were approved by the Commission for USWC in Docket No. T-01051B-93-0183 (Decision No. 59421).
7. Pursuant to Sections 3.6, 4.1.1 and 5.1(7), should CTS provide service in an area where CTS is the sole provider of local exchange service facilities, CTS will abide by the 1996 Act, the rules promulgated thereunder, and Commission rules in providing customers with access to alternative providers.

8. Pursuant to Sections 3.7 and 5.1(8), all CTS customers will have access to 911 and E911 service, where available. CTS will certify, through the 911 service provider in the area in which it intends to provide service, that all issues associated with the provision of 911 service have been resolved with the emergency service providers before CTS begins to provide local exchange service.
9. Pursuant to Sections 3.8 and 5.1(9), CTS will abide by the Commission's decisions and policies regarding Caller ID and other CLASS services.
10. Pursuant to Sections 3.9 and 5.1(10), CTS will comply with A.A.C. R14-2-1111, which requires that local exchange companies provide 2-PIC equal access.
11. Pursuant to Section 5.1(11), CTS will notify the Commission immediately upon changes to its address or telephone number.

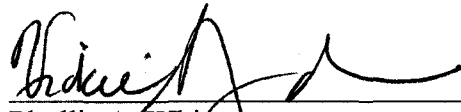
IV. CLARIFICATION OF INFORMATION IN THE STAFF REPORT

In response to information provided in the Staff Report, CTS clarifies that it is currently authorized to provide facilities-based and resold local exchange services in seven states: Arkansas, Louisiana, Michigan, Mississippi, Oregon, Washington, and Wisconsin. In addition, CTS clarifies that CTS was organized as a limited liability company in the State of Louisiana, not incorporated as provided in Section 2.3 of the Staff Report. Please also note that, as reflected in its Application, CTS is an affiliate of the following providers of telecommunications in the State of Arizona: CenturyTel Telecommunications, Inc., CenturyTel of the Southwest, Inc. d/b/a CenturyTel, and CenturyTel Long Distance, Inc.

V. CONCLUSION

For the reasons states above and in its Application, CenturyTel Solutions, LLC respectfully requests that the Commission grant CTS a Certificate of Convenience and Necessity to provide competitive facilities-based and resold intrastate telecommunications services in Arizona.

Respectfully submitted,



Phyllis A. Whitten

Vickie S. Byrd

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Counsel for CenturyTel Solutions, LLC

Dated: March 22, 2001

CERTIFICATE OF SERVICE

I, Anya Fletcher, hereby certify under penalty of perjury that a true and correct copy of the foregoing Comments to Staff Report was served on this 22nd day of March 2001, via overnight delivery on the following:


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Anya Fletcher